

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MICHAEL P. & SHELLIE GILMOR, et al.,)	
)	
Plaintiffs,)	Case No. 4:10-cv-0189-ODS
)	
v.)	
)	
PREFERRED CREDIT CORPORATION,)	
et al.,)	
)	
Defendants.)	

**DEFENDANT SOVEREIGN BANK’S UNOPPOSED MOTION FOR AN EXTENSION
OF TIME TO SERVE OBJECTIONS AND RESPONSES TO WRITTEN DISCOVERY**

Pursuant to Fed. R. Civ. P. 6(b), Defendant Sovereign Bank (“Sovereign”), by and through its undersigned attorneys, respectfully moves this Court for an extension of the deadline by which Sovereign must serve its responses to Plaintiffs’ Second Set of Interrogatories and Third Request for Production of Documents (the “Discovery Requests”). In support of this Motion, Sovereign states as follows:

1. Plaintiffs served the Discovery Requests on Sovereign on October 8, 2011.
2. Sovereign’s responses to the Discovery Requests are due to be served on November 10, 2011.
3. In order to properly respond to the Discovery Requests, and due to the press of business, Sovereign requests that the Court extend the deadline by which Sovereign is required to serve written responses through November 23, 2011.
4. Plaintiffs do not oppose the relief requested herein.
5. This Motion is not filed for purposes of oppression, harassment, or delay. Nor will the requested extension of time prejudice any party.

WHEREFORE, Sovereign respectfully requests that this Court grant this unopposed Motion and enter an Order extending the deadline by which Sovereign must serve responses to Plaintiffs' Second Set of Interrogatories and Third Request for Production of Documents through and including November 23, 2011.

Respectfully submitted,

Rasmussen, Willis, Dickey & Moore, L.L.P.

Dated: November 10, 2011

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document was filed electronically with the Clerk of the United States District Court for the Western District of Missouri, this 10th day of November, 2011, with notice of case activity to be generated and sent electronically to all designated persons.

/s/ Randolph G. Willis

An Attorney for Sovereign Bank